NMC
Committed to Nuclear Excellence

Monticello Nuclear Generating Plant
Operated by Nuclear Management Company, LLC

December 6, 2002

10 CFR Part 50
Section 50.55a(a)

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

M2002122

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Monticello Relief Request Number ISI No. 7
Use of 2001 Addenda for Repair/Replacement Program

The Monticello Nuclear Generating Plant is updating its Inservice Inspection Program for the Fourth Ten-Year interval to meet the 1995 Edition with the 1996 Addenda. The Monticello IWE/IWL Repair/Replacement Program currently meets the 1992 Edition, including the 1992 Addenda.

By Federal Register Notice dated September 26, 2002 (67 Federal Register 60520), the NRC amended 10 CFR 50.55a to incorporate by reference ASME Section XI, Division 1, of the ASME BPV Code, 1997 Addenda, 1998 Edition, 1999 Addenda, and 2000 Addenda for Class 1, Class 2, Class 3, Class MC, and Class CC components, with modifications and limitations. The effective date of this rule change is October 28, 2002.

Pursuant to the provisions of 10 CFR 50.55a, Nuclear Management Company, LLC (NMC) requests NRC approval of an alternative to allow the use of the 2001 Edition for repair and replacement activities. As discussed in the attached relief request, the maintenance of two separate repair/replacement programs results in unnecessary burden while providing no increase in quality or safety.

Our letter of May 30, 2002, entitled "Notification of Extension of 3rd Ten-year Inservice Testing and Inspection Intervals," informed NRC of our intention to extend the third ten year ISI interval through March 8, 2003. Thus, our fourth ten-year interval is currently scheduled for the period of March 9, 2002 through May 31, 2012. As discussed with NRC Project Manager John Lamb on December 2, 2002, we are in the process of reviewing implementation of the Fourth 10-Year Interval plan. Based on the results of our review, we will contact our NRC Project Manager to discuss NRC review schedules.

If you have any questions please contact Gary Park (763-295-1658) or John Fields (763-295-1663)

Jeffrey S. Forbes
Site Vice President
Monticello Nuclear Generating Plant

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Cc: (next page)

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cc: Regional Administrator-III, NRC
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Sr. NRC Resident Inspector, NRC
State of Minnesota Boiler Inspector
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COMPONENT IDENTIFICATION

Code Classes:	1, 2, and 3
References	IWA, IWB, IWC, IWD, and IWF-4000 (IWX-4000)
Examination Category:	Not Applicable
Item Number:	Not Applicable
Description	Use of the 2001 Edition of Section XI to Govern Repair/Replacement Activities and Procedures (IWX-4000).
Component Numbers:	All Class 1, 2, 3 and MC pressure retaining components and their supports

CODE REQUIREMENT

IWX-4000 (ASME Section XI 1995 Edition with the 1996 Addenda, used for Class 1, 2, and 3 components) provides the rules and requirements for repair/replacement activities associated with pressure retaining components and their supports, including appurtenances, subassemblies, parts of a component, core support structures, metal containments and their integral attachments, and metallic portions of Class CC containments and their integral attachments

IWX-4000 (ASME Section XI 1992 Edition with the 1992 Addenda, used for IWE components) provides the rules and requirements for the repair of pressure retaining components and their supports, including appurtenances, subassemblies, parts of a component, core support structures, metal containments and their integral attachments, and metallic portions of Class CC containments and their integral attachments, by welding, brazing, or metal removal. This article also provides the rules and requirements for the specification and construction of items to be used for replacements and installation of replacement items.

10 CFR 50.55a dated September 6, 1996 required the implementation of Subsections IWE and IWL of the 1992 Edition with the 1992 Addenda.

BASIS FOR RELIEF

The 1992 Edition with the 1992 Addenda to Section XI made several changes to Articles IWX-4000. Very few of these changes were technical in nature. Instead, the changes restructured some of the requirements, (ie. Combined IWX-4000 and IWX-7000 into one section) clarified others that were difficult to interpret, and eliminated redundant requirements. Of the actual technical changes made, these changes either added enhancements to the program or added requirements not applicable to Monticello.

Meeting both the 1995 with the 1996 Addenda and the 1992 with the 1992 Addenda of ASME Section XI would require the maintenance of two separate repair and replacement programs (one for the IWB, IWC, and IWD components per the 1996 Addenda of ASME Section XI and one for the 1992 Addenda for the containment vessel). Duplicate records to demonstrate compliance with the 1996 Addenda and the 1992 Addenda would also be required. This duplication of programs and records increases the man-hours necessary to maintain the Monticello Repair/Replacement Program without providing any increase in quality or safety.

The final rule (Federal Register/Vol. 67, No. 187, dated September 26, 2002) incorporates reference to the 1998 Edition through 2000 Addenda. Attached is a reconciliation of the changes made and a comparison of the 2001 Edition to the 2000 Addenda of Section XI. Each change related to Repair/Replacement Activities is addressed in the attachment to show it will be implemented at the Monticello

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ALTERNATE EXAMINATION

This alternative is requested in accordance with 10CFR 50 55a(a)(3)(ii) Monticello Nuclear Generating Plant will use the 2001 Edition of ASME Section XI, to govern Repair/Replacement Procedures (IWX-4000) for Class 1,2,3, and MC pressure retaining components and their supports Using the requirements contained in the 2001 Edition of ASME Section XI for Repairs/Replacements at the Monticello Nuclear Generating Plant will maintain the safety of the plant The following table indicates the implementation of the 2001 Edition for Repair/Replacement Activities.

Article	Topic	Bases
IWA-1000	Scope and Responsibility	1996 Addenda
IWA-2000	Examination and Inspection	1996 Addenda
IWA-3000	Acceptance Standards	1996 Addenda
IWA-4000	**Repair/Replacements**	**2001 Edition**
IWA-5000	Pressure Tests (Periodic)	1996 Addenda
IWA-5000	**Pressure Tests (Repair/Replacements)**	**2001 Edition**
IWA-6000	**Records**	**2001 Edition**
IWA-9000	**Glossary**	**2001 Edition**
IWB-1000	Scope and Responsibility	1996 Addenda
IWB-2000	Examination and Inspection	1996 Addenda
IWB-3000	Acceptance Standards	1996 Addenda
IWB-5000	Pressure Tests (Periodic)	1996 Addenda
IWB-5000	**Pressure Tests (Repair/Replacements)**	**2001 Edition**
IWC-1000	Scope and Responsibility	1996 Addenda
IWC-2000	Examination and Inspection	1996 Addenda
IWC-3000	Acceptance Standards	1996 Addenda
IWC-5000	Pressure Tests (Periodic)	1996 Addenda
IWC-5000	**Pressure Tests (Repair/Replacements)**	**2001 Edition**
IWD-1000	Scope and Responsibility	1996 Addenda
IWD-2000	Examination and Inspection	1996 Addenda
IWD-3000	Acceptance Standards	1996 Addenda
IWD-5000	Pressure Tests (Periodic)	1996 Addenda
IWD-5000	**Pressure Tests (Repair/Replacements)**	**2001 Edition**
IWE-1000	Scope and Responsibility	1992 Addenda
IWE-2000	Examination and Inspection	1992 Addenda
IWE-3000	Acceptance Standards	1992 Addenda
IWE-5000	Pressure Tests (Periodic)	Appendix J
IWE-5000	**Pressure Tests (Repair/Replacements)**	**2001 Edition w/ Appendix J**
IWF-1000	Scope and Responsibility	1996 Addenda
IWF-2000	Examination and Inspection	1996 Addenda
IWF-3000	Acceptance Standards	1996 Addenda
IWF-5000	Snubber Examinations and Tests	1996 Addenda

APPLICABLE TIME PERIOD

Relief is requested for the fourth ten-year interval of the Inservice Inspection Program for Monticello Nuclear Generating Plant.

RELIEF REQUEST NUMBER: ISI No. 7
Certificate of Reconciliation

This Certificate of Reconciliation provides the basis for revisions to the Monticello Nuclear Generating Plant's ASME Section XI "Repair /Replacement Program" (4AWI-09.04.03) in order to meet the 2001 Edition of ASME Section XI On September 9, 1996, the Nuclear Regulatory Commission (NRC) issued a revision to 10 CFR 50.55a, implementing subsections IWE and IWL* of the 1992 edition, including the 1992 addenda of Section XI of the ASME Code. This required utilities to develop and implement a program for the examination of containments by September 9, 2001. Additionally, it required implementation of an IWE/IWL repair/replacement program effective September 9, 1996 The Monticello Nuclear Generating Plant is updating the Inservice Inspection Program for the fourth ten-year interval to meet the 1995 Edition with the 1996 Addenda Because of the hardship to maintain two separate Repair/Replacement Programs, this alternative is made to allow the use of the 2001 Edition of ASME Section XI This reconciliation is completed to provide justification for allowing the use of the 2001 Edition for Class 1,2,3 and MC pressure retaining components and their supports.

The revision of 10CFR50 55a (12 months prior to the 4th 10 year interval for Monticello) requires ASME Section XI Programs to follow the 1995 Edition as amended by the 1996 Addenda of ASME Section XI for Class 1,2, and 3 and the 1992 Edition as amended by the 1992 Addenda for Class MC. There are some general issues to discuss prior to delineating the specific changes that have been made to the ASME Section XI Code (2000 Addenda to 2001 Edition)

1) The NRC has reviewed and approved with some exceptions the 1998 Edition through 2000 Addenda. This has been included in the Final Rule (dated September 26, 2002). Those specific exceptions made to the rules for repair/replacement activities are included in the implementation of the 2001 Edition
2) The Inservice Inspection requirements will be based on the 1995 Edition as amended by the 1996 Addenda.
3) The Periodic Pressure Testing requirements will be based on the 1995 Edition as amended by the 1996 Addenda. While the pressure testing requirements for repair/replacement activities will be based on the 2001 Edition.
4) The reconciliation attached will address the changes contained within the IWA-4000 paragraphs In addition, any significant changes identified within any related requirement will be addressed.

*IWL "Requirements for Class CC Concrete Components of Light-Water Cooled Plants" is not applicable to the Monticello Nuclear Generating Plant

RELIEF REQUEST NUMBER: ISI No. 7 Certificate of Reconciliation		
2001 Edition		
IWA-4110(b), IWA-4230, IWA-4400, IWA-4410, IWA-4411, IWA-4412, IWA-4413, IWA-4420, IWA-4421, IWA-4422, IWA-4430, IWA-4450, IWA-4451, Table IWA-4461.1-1, IWA-4461.4, IWA-4462, IWA-4500, IWA-4520, IWA-4600, IWA-4610, IWA-4611, IWA-4620, IWA-4624, IWA-4630, IWA-4634, IWA-4644, IWA-4654, IWA-4666, IWA-4711.4, IWA-4712, IWA-4721.1	This revision clarifies the requirements applicable to metal removal by grinding, thermal metal removal, welding, brazing, or modification In addition, provisions are added for metal removal not associated with defect removal, restoration of thinned areas by welding, and defect mitigation by modification The modified rules simplify defect removal requirements by applying Section XI acceptance criteria to existing base material and weld metal, and by only applying Construction Code acceptance criteria to new material and associated welds The revision also modifies the provisions regarding extent of defect removal required prior to application of a temperbead weld repair, by clarifying that defect removal is accomplished when the defect has been reduced to an acceptable flaw, whether or not temperbead welding will be performed A number of paragraphs have been reorganized to eliminate sources of misinterpretation of requirements	(See Note 1)
IWA-4131.1(a), 4713	This revision adds new requirements for qualification of Class 1 mechanical tube plugs These requirements represent a compilation of the standards and methods that have been used for twenty years to design, qualify, and install steam generator tube plugs They have proven to provide safe installation and service for mechanical steam generator tube plugs. These requirements include development and qualification of the plug design and of a Plugging Procedure Specification (PPS), and performance qualification for individuals who install the tube plugs	(See Note 2)
IWA-4132	This revision deletes the requirement for pressure testing and VT-2 visual examination of relief valves rotated from stock and installed by mechanical means In the 1999 Addenda, the requirement to pressure test mechanical joints made in installation of pressure retaining items was deleted from IWA-4540, because Owner's operation and maintenance personnel post-installation inspections are adequate without an additional Code-required examination With the deletion of pressure tests for mechanical connections, a similar exemption is warranted for installation of relief valves by mechanical means The revision also clarifies that no other IWA-4000 requirements apply to rotation of snubber and relief valves, except those of IWA-4132, and clarifies that use of an ANII is not required This revision incorporates the provisions of Case N-508-2, "Rotation of Serviced Snubbers and Pressure Relief Valves for the Purpose of Testing, Section XI, Division 1."	(See Note 3)

NOTE 1. It is important to apply the correct acceptance criteria to each repair/replacement activity completed. As reflected in the Final Rule, the NRC recognizes the difference between the NDE of the Construction Codes and ASME Section XI The Monticello R/R Program incorporates these rules.

NOTE 2. NMC feels it is important to have all special processes qualified and/or demonstrated to verify it's application The Monticello R/R Program incorporates these provisions

NOTE 3. Since the installation of mechanical joints does not require a VT-2 Examination, then the installation of relief valves rotated from stock and installed by mechanical means would also not require a VT-2 examination The Monticello R/R Program will include the following statement "The requirement to perform a pressure test on mechanical joints made during installation was deleted from Section XI IWA-4540(c), however, a pressure test shall be performed by Operations or Maintenance, but without a VT-2 exam "

TRANSMITTAL MANIFEST

NUCLEAR MANAGEMENT COMPANY, LLC

NUCLEAR LICENSING DEPARTMENT

MONTICELLO NUCLEAR GENERATING PLANT

Monticello Relief Request Number ISI No. 7
Use of 2001 Addenda for Repair/Replacement Program

Correspondence Date: December 6, 2002 Manifest Date: December 16, 2002

Monticello Site Distribution Special Instructions:

Melissa Miszczak.....USAR File. .. .. Yes___ No_x_
Ron Baumer. ... .NRC Commitment .... Yes___ No_x_
Linda Christianson. ...Monti OC Sec .... Yes___ No_x_ - 12, No dist to OC members below if YES
Darla Minkkinen.....Monti OSRC Sec ..... Yes___ No_x_ - 5

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